

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

SARA S. ECHEVARRIA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	NO.: 05-284 GMS
	)	
U-HAUL INTERNATIONAL, INC.,	)	
ROGER MAYFIELD,	)	TRIAL BY JURY DEMANDED
NATIONWIDE GENERAL	)	
INSURANCE COMPANY, U-HAUL	)	
CO. OF ARIZONA, U-HAUL CO. OF	)	
COLORADO and U-HAUL CO. OF	)	
FLORIDA,	)	
	)	
Defendants.	)	

**NOTICE OF RULE 30(b)(6) DEPOSITION(S) *DUCES TECUM*  
OF U-HAUL COMPANY OF FLORIDA**

TO: Stephen L. Caponi, Esquire  
Blank Rome, LLP  
Chase Manhattan Centre  
1201 Market Street, Suite 800  
Wilmington, DE 19801

Robert J. Leoni, Esquire  
Michael J. Logullo, Esquire  
Morgan Shelsby & Leoni  
221 Main Street  
Stanton, DE 19804

Francis H. LoCoco, Esquire  
Quarles & Brady LLP  
411 East Wisconsin Avenue  
Milwaukee, WI 53122

PLEASE TAKE NOTICE that, pursuant to Fed. R. Civ. P. 30(b)(6), counsel for plaintiff will take the deposition(s) *duces tecum* upon oral examination of a corporate designee of U-HAUL Company of Florida by one or more of its officers, directors, managing agents, or other persons who consent to testify on its behalf, with respect to matters known or reasonably available to U-HAUL Company of Florida as set forth in the attached Appendix to Notice of Rule 30(b)(6) Deposition(s) *Duces Tecum* of U-HAUL Company of Florida. The deposition(s) will proceed at 2451 McMullen

Booth Road, Suite 200, Clearwater, FL 33759, beginning at 11:00 a.m. on July 26, 2006, and continuing from day to day, during normal business hours, until completed.

MURPHY SPADARO & LONDON

/s/ Roger D. Landon  
ROGER D. LANDON, No. 2460  
1011 Centre Road, #210  
Wilmington, DE 19805  
(302) 472-8112  
Attorney for Plaintiff

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CO. OF ARIZONA, U-HAUL CO. OF	)	
COLORADO and U-HAUL CO. OF	)	
FLORIDA,	)	
	)	
Defendants.	)	
	)	

**CERTIFICATE OF SERVICE**

I, Roger D. Landon, Esq., do hereby certify that on this 22<sup>nd</sup> day of June, 2006, copies of the foregoing **NOTICE OF DEPOSITION** were delivered via electronic filing to the following individual(s):

Stephen L. Caponi, Esquire  
Blank Rome, LLP  
Chase Manhattan Centre  
1201 Market Street, Suite 800  
Wilmington, DE 19801

Robert J. Leoni, Esquire  
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MURPHY SPADARO & LANDON

/s/ Roger D. Landon

ROGER D. LANDON, No. 2460

1011 Centre Road, #210

Wilmington, DE 19805

(302) 472-8112

Attorney for Plaintiff

APPENDIX TO NOTICE OF RULE 30(b)(6) DEPOSITION(S)  
DUCES TECUM OF U-HAUL COMPANY OF FLORIDA

DOCUMENTS AND THINGS REQUESTED

It is requested that at the deposition U-HAUL Company of Florida produce for inspection and copying all of the following documents and things in its possession, custody or control:

1. All documents relating to the rental of the vehicle and trailer from U-HAUL Company of Florida to Roger Mayfield;
2. All documents relating to the maintenance and/or inspection of the vehicle and trailer rented to Mayfield;
3. All documents relating to any training provided to Roger Mayfield regarding the operation and use of the vehicle and/or trailer which are the subjects of this lawsuit;
4. All documents relating to U-HAUL Company of Florida's knowledge of any prior problems regarding detachments of trailers with the particular type of trailer coupler which is the subject of this lawsuit;
5. All documents relating to any insurance coverage provided to Mayfield in conjunction with the rental of the vehicle and trailer to him;
6. All documents relating to any investigation of the cause of the trailer detachment which is the subject of this lawsuit.

MATTERS FOR EXAMINATION

The deponent(s) should be prepared to testify concerning all responsive information available to U-HAUL Company of Florida related to the following subjects:

1. The Amended Complaint filed in the referenced matter;
2. The Answer of U-HAUL of Florida to the Amended Complaint in the referenced matter;
3. The rental agreement between U-HAUL Company of Florida and Roger Mayfield;
4. The policies and procedures of U-HAUL Company of Florida for maintenance and/or inspection of all vehicles and/or trailers including the vehicle and/or trailer which are the subjects of this lawsuit;

5. The training by U-HAUL Company of Florida of renters, including Roger Mayfield, regarding the operation and use of the types of vehicles and/or trailers which are the subjects of this lawsuit;
6. Knowledge by U-HAUL Company of Florida of any prior problems regarding detachments of trailers with the particular type of trailer coupler which is the subject of this lawsuit;
7. The existence and contents of all documents requested to be produced in the *duces tecum* to this deposition notice;
8. Any investigation or determination of the cause of the detachment of the trailer from the vehicle operated by Mayfield.